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STATE OF ALABAMA ETHICS COMMISSION

RSA UNION BUILDING
100 NORTH UNION STREET, SUITE 104
MONTGOMERY, ALABAMA 36104

MAILING ADDRESS
P. O. BOX 4840
MONTGOMERY, ALABAMA 36103-4840

PHONE: (334) 242-2997
FAX: (334) 242-0248

COMPLAINT

- I. Complainant's Name** : Christle D. Moreno, also known publicly as C.C. Dixon-Moreno
(Person making complaint)
- Address** : 28250 Canal Road, Unit 103
- City/County/State/Zip** : Orange Beach, Baldwin County, Alabama 36561
- Home and Cell Phone** : No cell number provided
- E-mail address** : CC@MorenoLawMS.com
- Place of Employment** : The Moreno Law Group, PLLC
- Employer's Address** : 5267 Old Hwy 11, Suite B
- City/County/State/Zip** : Hattiesburg, Lamar County, Mississippi 39402

**NOTE: PLEASE LIST ONLY ONE (1) RESPONDENT PER COMPLAINT FORM.
PLEASE USE A NEW FORM FOR EACH ADDITIONAL RESPONDENT.**

- II. Respondent's Name and Title/Position Held** : Renee Chang Eberly, City Clerk / Procurement Officer / Administration, City of Orange Beach, Alabama
(Person against whom complaint is made)
- Address** : c/o City of Orange Beach, 4099 Orange Beach Boulevard
- City/County/State/Zip** : Orange Beach, Baldwin County, Alabama 36561
- Phone number** : Office: 251-981-6806; c/o City of Orange Beach
- Place of Employment** : City of Orange Beach, Alabama
- Date of Occurrence** : Multiple acts from Sept. 2, 2024 through May 20, 2026; continuing; see Attachment A.

III. Statement of Facts:

Please set forth, in detail, the specific charges against the Respondent and factual allegations which support such charges. The space provided below is not intended to limit your statement of facts. Please feel free to attach additional sheets if necessary. Please include relevant dates and the names and addresses of other persons you believe to have knowledge of the facts.

See Attachment A and Exhibits A-L. Alleged violations include Ala. Code Sections 36-25-2, 36-25-5, 36-25-7, 36-25-14, and 36-25-17.

Sections 36-12-40 and 36-12-44 are public-records context. Respondent, as City Clerk/records custodian, allegedly used or caused use of City

employee time, records systems, police/BWC/CAD records, legal-review routing, procurement/legal-invoice records, insurance/League

communications, and taxpayer-funded resources to delay, deny, or gatekeep records involving Incident No. 24090105, Mayor Kennon,

Respondent, or other City officials for private, political, legal, or reputational protection.

Section 36-25-4(c) states: "Prior to commencing any investigation, the Commission shall: (1) receive a written complaint which sets forth in detail the specific charges against a respondent, and the factual allegations which support such charges."

"The complaint may only be filed by a person who has or persons who have credible and verifiable information supporting the allegations contained in the complaint."

IV. I understand that by filing this complaint, I am requesting an investigation be conducted into the conduct described herein. I understand that a criminal prosecution could result from the findings of the investigation which could require my testimony before a grand jury and/or during trial. It is my intention to fully cooperate with the staff of the Alabama Ethics Commission in the investigation of this matter. I agree to testify, if needed, before the Alabama Ethics Commission or any other judicial body necessary about matters related to this complaint. I understand that my failure to fully cooperate in this investigation could result in the dismissal of this complaint. I am aware that at the appropriate time this information may be available to the respondent or his/her attorney.

I hereby swear or affirm that the information on this form is true and correct to the best of my knowledge.

Complainant's Signature _____ Date _____

Notary's Signature _____ Date _____

Notary Seal _____ Date Notary Commission Expires _____

SUPPLEMENTAL VERIFICATION AND COMPLAINANT SIGNATURE PAGE

Because the Alabama Ethics Commission complaint form contains one signature line, this supplemental verification page is provided for the same complaint and the same respondent.

I, Christle D. Moreno, also known publicly as C.C. Dixon-Moreno, swear or affirm that the information contained in the complaint form, Attachment A, and the attached exhibits is true and correct to the best of my knowledge, information, and belief, and is based on credible and verifiable information.

Date of Complaint: June ____, 2026

Christle D. Moreno, Complainant: _____ Date: _____

Sworn to and subscribed before me this ____ day of _____, 2026.

Notary Public: _____ Date: _____

My commission expires: _____

Notary Seal

ATTACHMENT A

DETAILED STATEMENT OF FACTS AND SPECIFIC CHARGES TO THE ALABAMA ETHICS COMMISSION

Complainant: Christle D. Moreno, also known publicly as C.C. Dixon-Moreno

Respondent: Renee Chang Eberly, City Clerk / Procurement Officer / Administration, City of Orange Beach

This attachment is submitted to support the Alabama Ethics Commission complaint form. It is intentionally limited to credible, verifiable facts sufficient for the Commission to open an investigation and use its investigatory authority to obtain City records, communications, invoices, employment records, Statements of Economic Interests, and related documents.

I. VERIFICATION STANDARD

The facts below are based on my public-records history with the City of Orange Beach, City email threads, City signature blocks identifying Eberly as City Clerk / Procurement Officer | Administration, portal confirmations, City responses transmitted by Eberly, statements attributed to City Attorney review, and the exhibits attached. Where I do not have internal City records, I state the issue as a request for investigation rather than as a final conclusion.

II. STATUTES INVOKED

- Ala. Code Sections 36-25-1, 36-25-2, 36-25-4, 36-25-5, 36-25-7, 36-25-14, and 36-25-17.
- Ala. Code Section 36-12-44 is cited as contextual public-records authority because it was invoked in the attached records and because the issue is whether the form/portal process was used for protection rather than ordinary administration.
- Ala. Code Sections 11-43-43 and 11-43-56 are referenced as municipal-oversight context where City officials and City resources are used in records, legal, financial, and police matters.

III. SUMMARY OF SPECIFIC CHARGES

COUNT 1: IMPLEMENTATION OF PORTAL/FORM BARRIER FOR SENSITIVE RECORDS

The attached records show Eberly repeatedly directing Complainant to the City portal or form after written requests had already identified records with specificity. The Commission should investigate whether this was neutral administration or a recurring barrier used when records implicated Mayor Kennon, City legal exposure, police resources, City personnel, or public money.

COUNT 2: RECORDS-CUSTODIAN ROLE IN KENNON-RELATED WITHHOLDING

The September 3-22, 2025 request chain shows Eberly confirming portal requests and transmitting responses denying or limiting access to Incident No. 24090105 records. The Commission should determine who directed, drafted, reviewed, approved, or benefited from those denials and whether Eberly used public office or records systems for private or political protection.

COUNT 3: ROUTING SENSITIVE REQUESTS TO LEGAL AND POLICE

The December 18, 2025 and May 13, 2026 chains show Eberly forwarding sensitive requests to Legal and/or Police and later transmitting responses tied to City Attorney review. The Commission should investigate whether the routing was used to shield public officials rather than to administer records law neutrally.

COUNT 4: PROCUREMENT / LEGAL-INVOICE / PUBLIC-MONEY RECORDS

Because Eberly is identified as Procurement Officer and Administration, the Commission should investigate whether legal invoices, engagement letters, outside-counsel costs, Alabama League communications, insurance communications, procurement records, or payment records were withheld, delayed, narrowed, or shielded to conceal the public cost of protecting City officials.

COUNT 5: RECORDS HANDLING, LOGS, AND SEARCH DOCUMENTATION

The Commission should determine whether Eberly maintained or controlled portal logs, custodian notes, internal routing notes, search documentation, withholding explanations, and draft responses, and whether any such records were concealed, altered, withheld, or omitted from productions in a way that served private or political protection rather than public administration.

IV. FACTUAL BASIS

- Incident No. 24090105 concerns a September 2, 2024 domestic-dispute or domestic-violence-related law-enforcement response involving Mayor Tony Kennon at or near City property.
- On July 15, 2025, Complainant sent a signed written public-records request for body-camera footage, in-car video, metadata, CAD/radio traffic, and related records for Incident No. 24090105 to Mayor Kennon, Chief Steve Brown, and City Attorney Jamie Logan.

- Respondent Logan directed the request to the City Clerk and formal request form, and Respondent Eberly provided the City portal link. Logan then cited Ala. Code Section 36-12-44(a)(1) as authority for requiring the City form.
- After no production of the sensitive Kennon-related records, Complainant notified Logan, Eberly, Brown, and Kennon that litigation would be filed to compel production.
- The same pattern appears in later records involving City personnel relationships, police supervisor vehicle GPS/AVL data, records involving City Attorney Jamie Logan, Singleton v. Montgomery legal spending and Alabama League communications, and a May 2026 pending-criminal-matter records request denied per the City Attorney.
- The attached comparator exhibits show that the City could and did produce routine records in other contexts, supporting investigation into whether sensitive records were treated differently because of the officials implicated or the legal/political consequences of disclosure.

V. REQUESTED INVESTIGATION

- Determine whether Eberly used or caused the use of City Clerk authority, procurement/administration authority, City public-records systems, public employee time, police-record routing, legal-invoice functions, outside counsel, insurance-related resources, Alabama League communications, or taxpayer-funded resources for private, political, legal, or reputational protection of Mayor Kennon, Jamie Logan, herself, or other City officials.
- Determine who directed, drafted, reviewed, approved, or benefited from the portal/form directives, productions, denials, nonproductions, and completeness representations shown in Exhibits A-L.
- Obtain all portal logs, custodian notes, routing notes, internal emails, search documentation, withholding explanations, draft responses, legal-review notes, legal invoices, insurance communications, outside-counsel communications, and Alabama League communications concerning the records requests and events identified in Exhibits A-L.
- Determine whether referral to the Alabama Attorney General, appropriate District Attorney, or other prosecuting authority is warranted if the investigation establishes misuse of office, public-resource misuse, false reporting, obstruction, intimidation, or related misconduct.

VI. PERSONS BELIEVED TO HAVE KNOWLEDGE

- Jamie Parris Logan, City Attorney, City of Orange Beach, Alabama.
- Renee Chang Eberly, City Clerk / Procurement Officer / Administration, City of Orange Beach, Alabama.
- Anthony T. "Tony" Kennon, Mayor, City of Orange Beach, Alabama.
- Steve Brown, former Chief of Police; Trent Johnson or other senior police official; Ford Handley; City Council members; outside counsel; City IT/evidence-system personnel; insurance representatives; Alabama League of Municipalities representatives; and any custodian who searched, reviewed, approved, or denied the records at issue.

EXHIBIT INDEX

Exhibit	Description
A	July 15, 2025 Incident No. 24090105 public-records request and same-day City portal/form redirection email thread.
B	July 23-24, 2025 litigation and service follow-up after nonproduction of Incident No. 24090105 records.
C	July 17-21, 2025 OBCS / Kids First / personnel / budgeting / public-money records request and Eberly response.
D	July 21, 2025 City personnel / nepotism / conflict-policy request and Eberly portal-policy response.
E	July 21, 2025 police supervisor vehicle GPS/AVL/location-data request and Eberly portal-link response.
F	September 3-22, 2025 portal requests, confirmations, and denial/withholding of Incident No. 24090105 records.
G	September 4-22, 2025 Logan-related police/CAD/BWC/report request and City response.
H	December 18, 2025-May 20, 2026 Singleton / Alabama League / City legal-expenditure request chain.
I	May 13-June 3, 2026 pending-criminal-matter records request, Police/Legal routing, and denial per City Attorney.
J	Selective-compliance comparators: medical-provider contracts and routine police/fire reports produced in other requests.
K	Official-position proof for Jamie Parris Logan and Renee Chang Eberly from City email signature blocks.
L	Federal litigation source note concerning Christle D. Moreno v. City of Orange Beach, Alabama, et al., Civil Action No. 1:25-cv-00325-JB-B.

EXHIBIT A

July 15, 2025 Incident No. 24090105 request and same-day portal/form redirection email thread

Source: Superhuman thread 1980e3f4ebd670fa, subject "Public Record Request - Formal Demand for Incident 24090105."

Email 1 - July 15, 2025 at 8:21 a.m. CDT

From	cc@morenolawms.com
To	sbrown@orangebeachal.gov; tkennon@orangebeachal.gov; jlogan@orangebeachal.gov
Subject	Public Record Request - Formal Demand for Incident 24090105
Attachments listed	OBA Incident Request.pdf
Body	Mayor Kennon, Chief Brown, and Attorney Logan: Attached is my signed formal request, under Ala. Code Section 36-12-40, for all body-cam, in-car video, metadata, and CAD traffic from Incident 24090105 (domestic dispute, September 2, 2024, 27844 Canal Road). Please confirm receipt today and provide the records, or cite specific exemptions, within 5 business days. Thank you for your immediate attention. I look forward to your acknowledgment and a timely response.

Email 2 - July 15, 2025 at 8:41 a.m. CDT

From	jlogan@orangebeachal.gov
To	cc@morenolawms.com
Cc	sbrown@orangebeachal.gov; tkennon@orangebeachal.gov; reberly@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Attachments listed	OBA Incident Request.pdf
Body	Ms. Moreno, All public records requests must be submitted via the City Clerk and the formal request form which can be found on the City website. I have cc'd our City Clerk, Renee Eberly, who can direct you to the formal request form and provide any assistance you may require. Signature block identifies Jamie P. Logan as City Attorney, City of Orange Beach, P.O. Box 458, 4099 Orange Beach Blvd., Orange Beach, Alabama 36561.

Email 3 - July 15, 2025 at 9:04 a.m. CDT

From	reberly@orangebeachal.gov
To	jlogan@orangebeachal.gov
Cc	cc@morenolawms.com; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Body	Ms. Moreno, Here is the link to the public records request page on the city's website. The "records request form" link will take you to the form. Let me know if you run into any issues. https://www.orangebeachal.gov/173/Public-Records-Request Signature block identifies Renee Eberly as City Clerk/Procurement Officer Adm Orange Beach, P.O. Box 458, 4099 Orange Beach Blvd., Orange Beach, Alabama 36561, O: 251.981.6806,

Email 4 - July 15, 2025 at 9:12 a.m. CDT

From	cc@morenolawms.com
To	reberly@orangebeachal.gov
Cc	jlogan@orangebeachal.gov; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Body	Ms. Logan and Ms. Eberly, as well as the group at-large: Thank you for your reply directing me to submit a duplicate request through the City's online portal. Respectfully, no further submission is required. My signed letter dated July 15, 2025 satisfies Ala. Code Section 36-12-40; the statute imposes no additional form requirement once a written request is received by the custodian of the records. See <i>Stone v. Consolidated Publishing</i> , 404 So. 2d 678 (Ala. 1981). Because the request concerns potential misuse of public property and allegations of preferential treatment, I elected to transmit it directly to the Mayor, the City Attorney, the Chief of Police, and now the City Manager to ensure immediate preservation of the material. That request remains in full force. The 5-business-day response period, expiring July 22, 2025, continues to run from the date of acknowledged receipt. If the City contends that an online form is legally necessary, please cite the specific statutory authority that overrides Section 36-12-40. Otherwise, I look forward to: 1. Production of the complete body-worn-camera files, in-car video, metadata, and CAD radio traffic for Incident 24090105; or 2. A written statement identifying with precision any portion withheld and the statutory exemption relied upon. Please confirm that this email has been received and routed for processing.

Email 5 - July 15, 2025 at 4:10 p.m. CDT

From	jlogan@orangebeachal.gov
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To	cc@morenolawms.com
Cc	reberly@orangebeachal.gov; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Attachments listed	image001.jpg; image002.png
Body	Ms. Moreno, Pursuant to Alabama Code Section 36-12-44(a)(1), "The public officer may require the requester to submit his or her request using a standard request form...". The standard request form utilized by the City can be found on the City website. If you have any questions, please feel free to contact me at 251-923-5815 or jlogan@orangebeachal.gov. Signature block identifies Jamie Parris Logan as City Attorney, City of Orange Beach, O: 251-923-5815, jlogan@orangebeachal.gov.

Email 6 - July 15, 2025 at 4:46 p.m. CDT

From	cc@morenolawms.com
To	jlogan@orangebeachal.gov
Cc	reberly@orangebeachal.gov; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Attachments listed	image001.jpg; image002.png
Body	Ms. Logan: While I do acknowledge your reference to Ala. Code Section 36-12-44(a)(1), that provision permits, but does not mandate, a public officer to request the use of a standard form, provided such a request does not hinder or delay access or demand information beyond what is prescribed by the statute. As outlined in my written request submitted today, July 15, 2025, I have (1) clearly identified myself, (2) provided a detailed description of the records being sought, (3) specified my preferred method of delivery, and (4) included an offer to cover reasonable duplication costs. This request meets all statutory requirements for a "reasonably specific request" under Sections 36-12-40 and 36-12-41. Resubmitting the same information through the City's template serves no meaningful purpose and would only cause an unnecessary delay in the 5 business-day response period, which is critical to the public's interest in this matter. For these reasons, I formally decline to resubmit my request using the City's web form. The written request currently before you is legally sufficient, and the applicable response timeframe remains in effect, expiring at the close of business on July 22, 2025. Should the City refuse or fail to produce the requested records within the allotted time, please consider this notice of my intent to pursue legal action in Baldwin County Circuit Court under Ala. Code Sections 36-12-40 through 36-12-46. Your cooperation with my request would be appreciated, so as not to escalate this further than necessary.

EXHIBIT B

July 23-24, 2025 litigation and service follow-up after nonproduction

Source: Superhuman thread 1980e3f4ebd670fa, subject "Public Record Request - Formal Demand for Incident 24090105."

Email 1 - July 23, 2025 at 8:10 a.m. CDT

From	cc@morenolawms.com
To	jlogan@orangebeachal.gov
Cc	reberly@orangebeachal.gov; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Attachments listed	image001.jpg; image002.png
Body	Ms. Logan: In light of the City of Orange Beach's and your continued lack of response to my formal request for the body cam footage and additional information from the incident on September 2, 2024, I will be filing a suit in Baldwin County Circuit Court this week. The suit will seek a writ of mandamus and compel the release of the requested footage. As you are aware, the discovery process will provide an opportunity to address a range of questions regarding this incident, the City of Orange Beach's internal procedures, and the internal communications related to my request. Please let me know where the process server should deliver the relevant documents, or if you would prefer to waive service.

Email 2 - July 24, 2025 at 10:32 a.m. CDT

From	cc@morenolawms.com
To	jlogan@orangebeachal.gov
Cc	reberly@orangebeachal.gov; sbrown@orangebeachal.gov; tkennon@orangebeachal.gov; fhandley@orangebeachal.gov
Subject	Re: Public Record Request - Formal Demand for Incident 24090105
Attachments listed	image001.jpg; image002.png
Body	Ms. Logan: This suit will be served to the City of Orange Beach and its officials in their roles as record custodians tomorrow. Kindly provide the appropriate recipient for the service of process. If we do not receive a response by the end of today, we will proceed with serving it to an agent or employee at City Hall tomorrow as a representative of the City of Orange Beach.

EXHIBIT C

July 17-21, 2025 OBCS / Kids First / personnel / budgeting / public-money records request

Source: Superhuman thread 198195c5b593049b, subject "Public Records Request - Pursuant to Alabama Code Section 36-12-40."

July 17, 2025	Complainant sent Renee Eberly, Tony Kennon, Jamie Logan, and Randy Wilkes a public-records request stating: "Please see the attached public records request submitted pursuant to Alabama Code Section 36-12-40. I am requesting records related to academic performance at Orange Beach City Schools and the Board's contract with Kids First Education. This request is made as a private citizen and taxpayer. I respectfully request a response within 10 business days. If clarification is needed, I am happy to assist." Attachment listed: OBCS ACT Related Request.pdf.
July 18, 2025	Renee Eberly responded: "Ms. Moreno, all public record requests to the City must be submitted via the standard request form found on the website here: https://www.orangebeachal.gov/173/Public-Records-Request . However, as a courtesy, please be advised that the Orange Beach City School System is a separate entity and, as such, any records regarding school business, scores, contracts, etc., are held by the school. Requests for those records should go to the school system."
July 18, 2025	Complainant responded: "That's why I included them. Please advise where personnel and budgeting requests are to go, directly." Renee Eberly responded: "I'll defer to Superintendent Wilkes who you have copied to explain the school's procedures."
July 21, 2025	Renee Eberly stated that she received delivery-incomplete messages for rwilkes@orangebeachboe.com and provided rwilkes@orangebeachboe.org . Complainant responded that the paper copy would be delivered to Dr. Wilkes that day.

EXHIBIT D**July 21, 2025 City personnel / nepotism / conflict-policy request**

Source: Superhuman thread 1982ddbd6e177fca.

July 21, 2025 at 11:40 a.m. CDT	Complainant submitted a public-records request concerning current City employees who are related to Mayor Tony Kennon within three degrees of kinship or affinity, or married to, partnered with, or closely connected to other current City employees. The request also sought compensation data and policies governing nepotism or conflicts of interest. Attachment listed: PRR - City Personnel.pdf.
July 21, 2025 at 1:59 p.m. CDT	Renee Eberly responded: "Apologies, but I will need to consistently refer you to the link to the public records request page on the city's website for proper submission of your request per city policy. The "records request form" link will take you to the form."
July 21, 2025 at 2:06 p.m. CDT	Complainant objected to the City's ongoing refusal to honor written public-records requests submitted directly to officials and stated that there is no state-law requirement that a requester must use a specific City-controlled web portal.

EXHIBIT E**July 21, 2025 police supervisor vehicle GPS/AVL/location-data request**

Source: Superhuman thread 1982e25ec2d8cac0.

July 21, 2025 at 1:01 p.m. CDT	Complainant submitted a request for Orange Beach Police Department vehicles assigned to supervisory personnel, including GPS and AVL logs for a limited, defined period, and an updated inventory. The request was described as a narrowly tailored follow-up concerning potential misuse of City resources. Attachment listed: PRR - Supervisor GPS.pdf.
July 21, 2025 at 2:00 p.m. CDT	Renee Eberly responded: "Here is the link to the public records request page on the city's website. The "records request form" link will take you to the form."
July 21, 2025 at 2:05 p.m. CDT	Complainant objected to the City refusal to honor written requests and to the City-controlled portal as an unnecessary access barrier.

EXHIBIT F

September 3-22, 2025 portal requests, confirmations, and Incident No. 24090105 denial/withholding

Source: Superhuman thread 1991015a6de655d9; City responses dated September 22, 2025.

September 3, 2025 at 9:57 a.m. CDT	Complainant submitted a City portal request for Incident No. 24090105 seeking all camera footage, including BWC and in-car video, metadata logs, CAD/radio traffic, vehicle inventory, AVL/OPS logs for supervisory units, and records identifying officials notified or present.
September 3, 2025 at 10:04 a.m. CDT	Complainant submitted a second City portal request concerning related City records. Attachments listed in the source thread include portal confirmations for both requests.
September 4, 2025	Renee Eberly confirmed receipt of both September 3 requests.
September 22, 2025	Renee Eberly transmitted City responses. The response denied body-worn-camera footage, in-car video, metadata, CAD/radio traffic, AVL/OPS logs, and related records in whole or in part, relying on investigative-material and public-records positions including Ala. Code Section 12-21-3.1(b), Something Extra Publishing v. Mack, and provisions of Ala. Code Sections 36-12-40, 36-12-43, and 36-12-44. The City produced only partial vehicle-inventory type information.
Relevance	This exhibit shows that after Complainant used the City portal demanded by Logan and Eberly, the sensitive Kennon/body-camera records still were not fully produced and remained subject to legal gatekeeping.

EXHIBIT G**September 4-22, 2025 Logan-related police/CAD/BWC/report request**

Source: Superhuman thread 19915d2684a36ad8.

September 4, 2025 at 12:42 p.m. CDT	Complainant submitted a public-records request through the City portal concerning CAD data, body-worn camera footage, and reports relating to a matter involving City Attorney Jamie Logan or a City police interaction involving Respondent Logan.
September 5, 2025	Renee Eberly confirmed receipt of the request.
September 22, 2025	Renee Eberly responded to the September 4 request and attached a City response identified in the thread as 2025.09.04 Records Request - Christle CC Moreno_documents.pdf.
Relevance	This exhibit raises a direct conflict-review issue: any participation, direction, legal review, or approval by Respondent Logan concerning a request for records involving herself warrants Commission investigation.

EXHIBIT H

December 18, 2025-May 20, 2026 Singleton / Alabama League / legal-expenditure request chain

Source: Superhuman thread 19b31f8cb02981b8, subject "Christle Dixon Moreno Public Records Request."

December 18, 2025 at 8:58 a.m. CST	Complainant submitted a public-records request concerning Singleton v. Montgomery, Alabama League of Municipalities involvement, City legal expenditures, amicus participation, legal invoices, communications, and related public-money records.
December 19, 2025	Renee Eberly confirmed receipt and stated that she was forwarding the request to the Legal Department for review and response.
January 9, 2026	Renee Eberly produced records including police reports, December 2 Committee-of-the-Whole minutes, December 2 Council minutes/agenda, and Resolution 25-227 authorizing an amicus brief in Singleton v. Montgomery.
January 17, 2026	Complainant objected that the production was incomplete and copied Dennis Green, stating that the issue was further evidence of failure to comply in an ongoing matter.
January 20, 2026	Renee Eberly stated that the City Attorney had reviewed the request and confirmed that all public records held by the City relevant to the request had been provided.
February 25-26, 2026	Complainant followed up that a response was required. Renee Eberly later produced an additional invoice for legal/Galloway Wettermark Rutens Amicus Brief and stated that prior records encompassed all records identified in the original request. Complainant asked for confirmation that there were no communications between the City, officials, employees, and the Alabama League of Municipalities regarding Singleton v. Montgomery.
February 26, 2026	Renee Eberly stated that she had provided all responsive documents submitted to her and that Complainant or her attorney could contact City Attorney Jamie Logan. Complainant reasserted the full measure of the request to Logan, including Alabama League communications.
May 20, 2026	Complainant notified Jamie Logan that if a complete response was not received by close of business Friday, further litigation would follow on this and four other unfulfilled requests. Logan responded that all public records subject to the December 18 request had been provided.
Relevance	This exhibit supports investigation into City legal-review loops, completeness of legal-invoice and Alabama League records, and whether public-money records were shielded through the City Attorney or records-custodian process.

EXHIBIT I

May 13-June 3, 2026 pending-criminal-matter records request and denial per City Attorney

Source: Superhuman thread 19e2314390d0fc91, subject "Christle D. Moreno Public Records Request."

May 13, 2026 at 3:43 p.m. CDT	Complainant submitted a City portal request concerning police records related to a pending criminal matter in which Complainant was the complaining witness/victim.
May 13, 2026	Renee Eberly confirmed receipt and stated that she was forwarding the request to the Police Department and Legal Department.
May 21, 2026	Renee Eberly denied police reports related to a pending case and stated that evidence must be obtained through criminal discovery in the pending action.
May 21-22, 2026	Complainant requested the specific Alabama code, ordinance, policy, or federal law supporting the denial. Officer Blair stated that public-records requests and procedures were outside the Police Department and directed Complainant back to the City Clerk.
June 3, 2026	Renee Eberly, copying Jamie Logan and others, stated: "Per our City Attorney," the request was denied because the records involved a pending criminal matter and were not subject to public-record disclosure.
Relevance	This exhibit shows sensitive police records routed through Police and Legal, with the final denial attributed to the City Attorney and transmitted by the City Clerk.

EXHIBIT J**Selective-compliance comparators: routine productions**

Source: Superhuman threads 1991a2de4071d8de and 19b954413f731951.

September 5-19, 2025	In a separate request, Renee Eberly produced Southern Rapid Care and other medical-provider contracts. This shows that the City could locate and produce routine contract records when the request did not present the same sensitivity as Kennon/body-camera, Logan-related, or legal-spending records.
January 6-16, 2026	In another request, Renee Eberly confirmed and produced police/fire reports. This is a comparator showing that police/fire records were not categorically impossible to produce in all circumstances.
Relevance	These comparators support investigation into whether the City treated sensitive records differently because of the public officials or private interests involved, not because of a neutral administrative rule.

EXHIBIT K

Official-position proof for respondents

Source: City of Orange Beach email signature blocks in Superhuman threads 1980e3f4ebd670fa and 198195c5b593049b.

Jamie Parris Logan	City email signature blocks identify Jamie Parris Logan as City Attorney, City of Orange Beach Blvd., Orange Beach, Alabama 36561. One signature lists O: 251-923-5815, jlogan@orangebeachal.gov, and www.orangebeachal.gov.	Box 458, 4099 Orange Beach, Alabama 36561
Renee Eberly	City email signature blocks identify Renee Eberly as City Clerk/Procurement Officer Administration, City of Orange Beach, P.O. Box 458, 4099 Orange Beach Blvd., Orange Beach, Alabama 36561, O: 251.981.6806,	Orange Beach, Alabama 36561
Relevance	These source records establish that the conduct described in the complaint occurred through official City roles, City email accounts, City records processes, and City signature blocks.	

EXHIBIT L

Federal litigation source note

Source: Christle D. Moreno v. City of Orange Beach, Alabama, et al., United States District Court for the Southern District of Alabama, Civil Action No. 1:25-cv-00325-JB-B.

Case context	The related federal litigation concerns public-records and civil-rights claims involving the City of Orange Beach and Mayor Tony Kennon, including requests for body-camera footage, in-car video, metadata, CAD records, radio traffic, and related records arising from the September 2, 2024 police response involving Mayor Kennon.
Public-records context	The federal litigation anchors the Incident No. 24090105 request universe, the City's reliance on investigative-materials arguments, the denial history, and the alleged constitutional/public-records pattern.
Relevance	The Commission should review the operative complaint, order on motion to dismiss, discovery requests, public-records responses, privilege logs, legal invoices, insurance/coverage communications, and internal communications regarding litigation strategy and records withholding.